

UNITED STATES BANKRUPTCY COURT

FILED

FOR THE DISTRICT OF SOUTH CAROLINA 02 MAY 28 AM 11:25

IN RE:

) Docket # 02-01219-B

U.S. BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

Eula Avey Weatherford

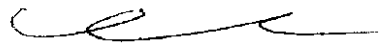
Debtor(s)

**MOTION TO SELL PROPERTY FREE AND CLEAR OF LIENS AND
MEMORANDUM**

The undersigned, as attorney for the debtor moves to sell property free and clear of liens. The debtor moves to sell 1/3rd of the 13.73 acres, approximately 4.58 acres, known as 310 Cypress Gardens Rd Moncks Corner, SC 29456, to include the buildings currently occupied by New Beginnings Worship Center pursuant to 11 U.S.C. § 363 and Bankruptcy Rule 6004. The debtor proposes to divide her current residence and sell one third of the property. A survey of the property as being prepared to identify the proposed portion of the property to be sold. This will reduce the estate's liability and give the plan of reorganization and better chance for success.

Wherefore, debtor prays that the Court will grant this motion and allow the debtor to sell 1/3rd of the 13.73 acres, approximately 4.58 acres, known as 310 Cypress Gardens Rd Moncks Corner, SC 29456 free and clear of liens.

RESPECTFULLY SUBMITTED,



D. Nathan Davis
Attorney for the Debtor
1124 Sam Rittenberg, Suite 8
Charleston, SC 29407
(843) 571-4042
District Court ID # 438

Charleston, South Carolina

21 day of May, 2002.

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May 16, 2002

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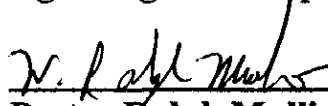
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TO WHOM IT MAY CONCERN:

New Beginnings Worship Center has an agreement with Eula Avey to purchase one-third (1/3) of the 13.73 acres (TMS 210-00-00-050-000) of land more fully described on a "Plat of Land - 13.73 AC. owned by Trustees Under the Will of H. Smith Richardson" made by J. Hugh Campbell, Jr., SCRLS, dated March 25, 1981. This agreement also includes the existing building located on the property that is currently occupied by New Beginnings Worship Center. The purchase price of the one-third (1/3) of the 13.73 acres and the existing building is \$145,000.00.

New Beginnings Worship Center

By:



Pastor Ralph Mullins


(Witness)

State of South Carolina

County of Berkeley

Subscribed and affirmed before me
this 16th day of May, 2002.



Notary Public for South Carolina

My Commission Expires: 10/12/2002